

**EXHIBIT B****BUDGET AND STAFFING PLAN**

<b>BUDGET NOVEMBER 2024 – JULY 1, 2025</b>		
<b>Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees</b>
Case Administration (B001)	368.80	\$311,388.70
Court Hearings (B002)	1317.30	\$1,112,102.50
Cash Collateral/DIP Financing (B003)	52.70	\$44,484.10
Schedules & Statements, U.S. Trustee Reports (B004)	158.10	\$133,452.30
Lease/Executory Contract Issues (B005)	52.70	\$44,484.10
Use, Sale or Lease of Property (363 issues) (B006)	474.20	\$400,356.90
Claims Analysis, Objections and Resolutions (B007)	421.50	\$355,872.80
Meetings (B008)	421.50	\$355,872.80
Stay Relief Matters (B009)	105.40	\$88,968.20
Reclamation Claims and Reclamation Adversaries (B010)	0.00	\$0.00
Other Adversary Proceedings (B011)	210.80	\$177,936.40
Plan and Disclosure Statement (B012)	1053.80	\$889,682.00
Creditor Inquiries (B013)	0.00	\$0.00
General Corporate Matters (B014)	52.70	\$44,484.10
Employee Matters (B015)	52.70	\$44,484.10
Asset Analysis (B016)	52.70	\$44,484.10
Retention of Professionals/Fee Issues (B017)	316.10	\$266,904.60
Fee Application Preparation (B018)	105.40	\$88,968.20
Travel (B019)	0.00	\$0.00
Utility Services (B020)	52.70	\$44,484.10
<b>Total</b>	<b>5269.10</b>	<b>\$4,448,410.00</b>

<b>STAFFING PLAN</b>		
<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on the Matter During the Budgeted Period</b>	<b>Average Rate<sup>1</sup></b>
Partner	2	\$1,247.00
Counsel	N/A	N/A
Associate (7 or more years since first admission)	1	\$780.00
Associate (4-6 years since first admission)	-	-
Associate (less than 4 years since first admission)	1	\$580
Paralegal	1	\$385.00
<sup>1</sup> The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the Budgeted Period.		